

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

v.

SIMON T. TUSHA

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**CASE NO. 2:16-cr-00055-TFM
(18 U.S.C. 371)**

DEFENDANT'S MOTION FOR POSTPONEMENT OF SENTENCING

Simon T. Tusha, by and through undersigned counsel, hereby moves this court for a 120 day postponement of his sentencing, which is currently scheduled for September 16, 2016, until January 16, 2017. Defense counsel has discussed with Assistant U.S. Attorney Jim Wilson the need for additional time to address matters related to the sentencing, and he has no objection to a 120 day postponement.

Respectfully submitted this 15^h day of July, 2016.

/s/ Bruce Bettigole

Bruce M. Bettigole

District of Columbia Bar No. 358103

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Attorney for Defendant Simon Tusha

CERTIFICATE OF SERVICE

I certify that on this 15th day of July, 2016, I caused the foregoing Defendants' Motion for Postponement of Sentencing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

By: /s/ Bruce Bettigole